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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

JAMES ROOT,

Plaintiff,

V.

AMERICAN EXPRESS NATIONAL BANK,
EXPERIAN INFORMATION SOLUTIONS,
INC., TRANS UNION LLC.

Defendants.

Case No. 2:20-cv-02267-RFB-NJK

**JOINT MOTION AND ORDER
EXTENDING DEFENDANT TRANS
UNION LLC'S TIME TO FILE AN
ANSWER OR OTHERWISE
RESPOND TO PLAINTIFF'S
COMPLAINT
(FIRST REQUEST)**

Plaintiff James Root (“Plaintiff”) and Defendant Trans Union LLC (“Trans Union”), by and through their respective counsel, file this Joint Motion Extending Defendant Trans Union’s Time to File an Answer or Otherwise Respond to Plaintiff’s Complaint.

1. On December 15, 2020, Plaintiff filed his Complaint. The current deadline for Trans Union to answer or otherwise respond to Plaintiff's Complaint is February 16, 2021.

2. On February 15, 2021, counsel for Trans Union communicated with Plaintiff's counsel via email regarding an extension within which to file a response to the Complaint, and Plaintiff's counsel agreed to the extension.

3. The parties are actively discussing a potential early resolution of this case, and the parties believe an extension of this nature may save waste of the parties' time and expense. The

additional time will allow Plaintiff and Trans Union time to fully explore such early settlement discussions.

4. Moreover, Trans Union's counsel will need additional time to review the documents and respond to the allegations in Plaintiff's Complaint. This Joint Motion is made in good faith and not for the purposes of delay.

5. Plaintiff has agreed to extend the deadline in which Trans Union has to answer or otherwise respond to Plaintiff's Complaint up to and including March 8, 2021. This is the first motion for extension of time for Trans Union to respond to Plaintiff's Complaint.

Dated this 16th day of February 2021.

QUILLING SELANDER LOWNDS
WINSLETT & MOSER, P.C.

/s/ Jennifer Bergh

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ORDER

The Joint Motion for Extension of Time for Trans Union LLC to file an answer or otherwise respond to Plaintiff's Complaint is so ORDERED AND ADJUDGED.

Dated: February 17, 2021

UNITED STATES MAGISTRATE JUDGE